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7 *Attorneys for XL Specialty Insurance Company*

8
9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

Chapter 11

13 **PG&E CORPORATION,**

Case No.: 19-30088

(Lead Case)

(Jointly Administered)

14 **-and-**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

XL SPECIALTY INSURANCE
COMPANY'S WITHDRAWAL OF ITS
CURE OBJECTION

17 **Debtors.**

- 18 — Affects PG&E Corporation
19 — Affects Pacific Gas and Electric
20 Company
21 X Affects both Debtors

22 **All papers shall be filed in the Lead
Case, No. 19-30088 (DM)*

23 XL Specialty Insurance Company (“XL Specialty”), by and through its
24 undersigned counsel, respectfully withdraws its “Cure Objection” (defined below) as
25 follows:

26 / / /

27 / / /

1 XL Specialty had filed the following documents in the above-captioned case:

2 (1) *XL SPECIALTY INSURANCE COMPANY'S OBJECTION TO: (A) DEBTORS'*
3 *AND SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF*
4 *REORGANIZATION DATED MARCH 16, 2020; AND (B) SCHEDULE OF*
5 *EXECUTORY CONTRACTS TO BE ASSUMED PURSUANT TO THE PLAN*
6 *AND PROPOSED CURE AMOUNTS* [Dkt. 7193] ("XL Specialty's
7 Objection"); and

8 (2) *XL SPECIALTY INSURANCE COMPANY'S JOINDER WITH: (A) LIMITED*
9 *OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED*
10 *CREDITORS TO PLAN CONFIRMATION; AND (B) SOUTH SAN JOAQUIN*
11 *IRRIGATION DISTRICT'S (1) OBJECTION TO DEBTORS' AND*
12 *SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF*
13 *REORGANIZATION DATED MARCH 16, 2020 AS AMENDED AND (2)*
14 *OBJECTION TO CURE AMOUNTS AND OTHER MATTERS PERTAINING*
15 *TO ASSUMPTION PURSUANT TO SECTION 365(b)(1) OF THE*
16 *BANKRUPTCY* [Dkt. 7388] ("XL Specialty's Supplemental Objection").

17 In its XL Specialty's Objection and XL Specialty's Supplemental Objection, XL
18 Specialty objected to the Debtors not providing for a prompt cure of the defaults, as
19 required by Bankruptcy Code § 365(b)(1), with respect to the Surety Bonds¹ and the
20 related Indemnity Agreement in their Assumption Schedule in the Debtors' Plan
21 Supplement (the "Cure Objection").

22 XL Specialty and the Debtors have reached an agreement on a proper "cure
23 amount" to be paid to XL Specialty and the Debtors have paid this amount to XL
24 Specialty. Therefore, XL Specialty hereby withdraws its Cure Objection effective
25 immediately.

26
27

¹ Terms that are not defined herein, shall have the meaning set forth in XL Specialty's Objection.
28

RESPECTFULLY SUBMITTED this 19th day of October, 2020.

SMTD Law LLP

By /s/Robert J. Berens

Robert J. Berens

Marilyn Klinger

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Attorneys for XL Specialty Ins. Co.

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14 **-and-**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

CERTIFICATE OF SERVICE

17 **Debtors.**

18 — Affects PG&E Corporation
19 — Affects Pacific Gas and Electric Company
X Affects both Debtors

20 *All papers shall be filed in the Lead Case, No.
21 19-30088 (DM)

22 I am a resident of the State of California, over the age of eighteen years, and not a party
23 to the within action. My business address is: SMTD Law LLP, 17901 Von Karman Avenue,
24 Suite 500, Irvine, California 92614. On **October 19, 2020**, I served the within document, **XL**
SPECIALTY INSURANCE COMPANY'S WITHDRAWAL OF ITS CURE
OBJECTION, on the interested party(s), listed below, as follows:

- 25 **FACSIMILE.** By transmitting via facsimile the document(s) listed above to the
26 fax number(s) set forth on the attached Telecommunications Cover Page(s) on this
27 date before 5:00 p.m.

- U.S. MAIL.** By placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below in Exhibit "A". I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
 - PERSONAL SERVICE.** By causing document(s) listed above to be personally delivered the person(s) at the address(es) set forth below.
 - OVERNIGHT COURIER.** By placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below.
 - ELECTRONIC.** By electronically transmitting the document(s) listed above to the electronic notification address(es) of the addressee(s) listed below in Exhibit "A".

I declare under penalty of perjury under the laws of the State of Arizona that the above is true and correct. Executed on October 19, 2020, at Phoenix, Arizona.

/s/Sonya Rodriguez
Sonya Rodriguez

Exhibit "A"

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